

Message

---

**From:** Ed Stone -MDE- [ed.stone@maryland.gov]  
**Sent:** 4/15/2020 7:36:07 PM  
**To:** Price-Fay, Michelle [Price-Fay.Michelle@epa.gov]  
**Subject:** general permit expiration topic (hopefully this topic is not expired ;-)

Hi Michelle,

I hope you and your team at EPA are all staying well! Some time ago I asked for the regulation regarding expired general permits in support of your position to demonstrate it was a rule and not a preference. I also believe I stated that we are willing to consider this approach in the implementing language of future permits, but not to superimpose it on existing permits. Such a radical change at this juncture would make us all liable to legal action by the regulated community who would have a strong basis for their position with regard to a sudden arbitrary and capricious policy that is not supported by any new regulation at the time of the change in how the permits are being viewed and enforced.

Please give me a call to discuss at your earliest convenience. If you use Microsoft Teams for teleconference, I can handle that, or I can set up a google hangouts call, or just call my cell phone 410-529-7404.

Thanks,  
Ed



**Ed Stone**  
Wastewater Discharge Permits Program Manager  
Water and Science Administration  
Maryland Department of the Environment  
1800 Washington Boulevard  
Baltimore, Maryland 21230  
[Ed.Stone@maryland.gov](mailto:Ed.Stone@maryland.gov)  
**410-529-7404 Cell**  
[Website](#) | [Facebook](#) | [Twitter](#)

[Click here](#) to complete a three question customer experience survey.